

## 4.5 Corrective Actions

Corrective actions may be required for two classes of problems:

- analytical and equipment problems
- noncompliance problems.

Analytical and equipment problems may occur during sampling and sample handling, sample preparation, laboratory instrumental analysis, and data review. For noncompliance problems, a formal corrective action program will be initiated as soon as the problem is identified. The person who identifies the problem is responsible for notifying the CDM Project Manager, who is in turn responsible for notifying the CDM Project Quality Assurance Officer (QAO). Implementation of corrective action will be confirmed in writing through the same channels.

Any nonconformance with the established quality control procedures in the FSP will be identified and corrected in accordance with this Field Sampling Plan. MDEQ will be notified of a nonconformance situation in as timely a manner as possible.

Corrective actions will be implemented and documented, and MDEQ Project Manager will be notified. No staff member will initiate corrective action without approval of the CDM Project Manager. If corrective actions as implemented are insufficient, work may be stopped by the CDM's QAO.

### 4.5.1 Field Corrective Action

Technical staff and project personnel will be responsible for reporting all suspected technical or QA nonconformances or suspected deficiencies of any field activity or issued document by reporting the situation to the CDM Project Manager or designee. This manager will be responsible for assessing the suspected problems in consultation with the CDM's QAO, and on making a decision based on the potential for the situation to impact the quality of the data. If it is determined that the situation warrants a reportable nonconformance requiring corrective action, then a nonconformance report will be initiated by the CDM Manager.

The CDM Project Manager will be responsible for ensuring that corrective action for nonconformances are initiated by:

- evaluating all reported nonconformances
- controlling additional work on nonconforming items
- determining disposition or action to be taken
- maintaining a log of nonconformances
- reviewing nonconformance reports and corrective actions taken